

FILED

MAY 10 2016

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRIDGET BRASFIELD,

Defendant.

No. 16-CR-30054-SMY

STIPULATION OF FACTS

The attorneys for the United States and the attorney for the Defendant have engaged in discussions and have stipulated to the following facts to support the plea of guilty in accordance with U.S.S.G. § 6B1.4.

1. That BRIDGET BRASFIELD was, at the time of the offenses, a chiropractic physician licensed by the State of Illinois.

2. That BRASFIELD operated a physical medicine practice known as Physical Medicine Clinic of Granite City Ltd., which was located in Granite City, Madison County, Illinois.

3. That BRASFIELD, while doing business as the Physical Medicine Clinic LTD., entered into participation agreements with various health care benefit programs, both public and private, in order to submit claims for reimbursement to those benefit plans.

4. That BRASFIELD employed various individuals at her clinic, including a medical doctor whose presence and services would allow for the clinic to submit claims for higher reimbursement than would be allowed without the presence of a medical doctor.

5. That Health Care benefit plans commonly referred to as medical insurance have specific coverage limits and requirements for reimbursement for medically reasonable and necessary services that are performed for treatment of specific medical conditions or issues.

6. That BRASFIELD submitted and caused to be submitted, to various health care benefit programs, claims for services that falsely and fraudulently stated that a physician had performed services that had not been provided by a physician.

7. That as part of the scheme, BRASFIELD would falsely and fraudulently utilize the physician's billing number to submit claims for payment because, as she well knew, the reimbursement or payment for services would be substantially higher if a physician had in fact performed the services.

8. That BRASFIELD would bill for services as if the physician had performed those services, even when the clinic's physician was not in the building and in many instances when the physician was out of the country.

9. That Health Care benefit plans falsely billed by BRASFIELD included Medicare, Medicaid, Tricare, Blue Cross Blue Shield of Illinois and Coventry Insurance, and such billing did have an effect on interstate commerce.

10. That between January 1, 2011 and January 31, 2014, BRASFIELD, submitted or caused to be submitted approximately \$500,000 in false claims by making materially false and fraudulent representations in claims submitted.

11. That on or about May 5, 2011, BRASFIELD did knowingly engage in a monetary transaction in criminally derived property of a value greater than \$10,000. In that BRASFIELD caused a wire transfer from Bank of Edwardsville account ending in 9601, which was under her control, to be made into a Bank of Edwardsville account ending in 9603, under her control, in the

amount of \$12,000.00. BRASFIELD admits that funds had been deposited into the account ending in 9601 were derived from the specified unlawful activity of health care fraud and which monetary transaction involved the deposit or transfer of a monetary instrument by, through and to a financial institution.

12. BRASFIELD committed the criminal activity while she was within the Southern District of Illinois.

IT IS SO STIPULATED.



BRIDGET BRASFIELD
Defendant

JAMES L. PORTER
Acting United States Attorney



RANLEY R. KILLIAN
Assistant United States Attorney

SCOTT A. VERSEMAN
Assistant United States Attorney

LENNY KAGAN

Dated: May 10, 2016

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